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REMARKS

Claims 1-18 were originally presented in the subject application. Claim 19 was added in a Response to Office Action dated August 18, 2004, and claim 20 was added in a Response to Office Action dated December 23, 2004. Claims 1, 4, 11, 14, 15 and 17-19 have herein been amended to more particularly point out and distinctly claim the subject invention. No claims have herein been canceled. Therefore, claims 1-20 remain in this case.

The addition of new matter has been scrupulously avoided. In that regard, support for the common amendment to the claims can be found throughout the specification and claims, for example, claim 7 as filed.

Applicant respectfully requests entry of the instant amendment, and reconsideration and withdrawal of the various grounds of rejection.

35 U.S.C. §103(a) Rejection

The Office Action rejected claims 1-3, 11-13 and 15-18 under 35 U.S.C. §103(a), as allegedly obvious over Papadopoulos et al. (U.S. Patent No. 6,061,603) (hereinafter referred to as "Papa"), in view of Margolin (U.S. Patent No. 5,904,724). Applicant respectfully, but most strenuously, traverses this rejection.

Claim 1 has been amended to recite, for example, three-dimensional model data *for* a terminal device, rather than the previous "concerning" language.

The final Office Action made clear that the scope given to the term "concerning" for examination purposes was greater than that contemplated by Applicant. By this amendment, Applicant makes clear that the three-dimensional model data is for the terminal device, rather than just tangentially related to the terminal device.

Against this aspect of claim 1, the Office Action admits that Papa does not explicitly state three-dimensional model data. Instead, the Office Action relies on Margolin.

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Margolin teaches the remote piloting of an aircraft. A careful review of Margolin reveals that the three-dimensional view referred to therein is a view of the terrain over which the plane is flying, and not a view of the cockpit controls. See, for example, FIG. 7, which shows an example of such a view, along with the description thereof within "The Database" section in Margolin at col. 9, line 65 to col. 10, line 57. See also, col. 5, lines 55-67 giving examples of image areas outside the plane. The final Office Action at page 9 admits that the three-dimensional data in Margolin is of the terrain, rather than the aircraft, "but the terrain generated is concerned with its proximity of the terminal device." However, in light of the amendment made herein, Applicant submits this line of argument fails.

In addition, Applicant submits the combination of Margolin (as explained above) with Papa makes little sense, as Papa is not concerned with visual information of the terrain or surroundings around the industrial system that is being controlled. Moreover, there is no teaching or suggestion in Papa or Margolin of utilizing three-dimensional model data of the terminal device itself.

Indeed, Applicant submits that there is no need for three-dimensional modeling data in Papa. Papa teaches the remote control of a Programmable Logic Controller for an industrial control system. Applicant submits that those in control of such a system are engineers and technicians with substantial knowledge of the industrial system they are controlling. This is a very different scenario than the consumer-oriented implementation disclosed in the present application. Indeed, Papa teaches the use of a simple system illustration for the person controlling it (see FIG. 4, showing a simple circuit diagram), and, as remarked above, the three-dimensional data in Margolin is that of the terrain surrounding the aircraft.

Therefore, Applicant submits claim 1 cannot be rendered obvious over Papa in view of Margolin.

Claims 11, 15, 17 and 18 have also been amended to recite that three-dimensional model data for the terminal device, rather than concerning the terminal device. Thus, the comments made above with respect to claim 1 apply equally to those claims as well.

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The Office Action also rejected claims 7-10 as allegedly obvious over Papa in view of Margolin, and in further view of Matsui et al. (U.S. Patent No. 6,437,778). Applicant respectfully, but most strenuously, traverses this rejection as well.

Claim 7 recites, for example, three-dimensional model data, including geometrical data for the terminal device. Against this aspect of claim 7, the final Office Action again cites to Margolin at column 1, lines 42-55. However, the cited section of Margolin contains no teaching or suggestion of geometrical data of the aircraft, only data regarding the terrain, and data regarding "location, attitude, and other operating conditions" of the aircraft. Neither Papa nor Matsui et al. remedy this shortcoming.

Claim 7 also recites, as another example, a module for recording an operation performed by a user as an operation event and for replaying, as needed, the operation event. Against this aspect of claim 7, the final Office Action cites to Matsui et al. at col. 5, line 46 through col. 6, line 4, and col. 7, lines 26-32. However, a careful review of the cited sections of Matsui et al. reveals that the first section contains no disclosure, teaching or suggestion about recording an operation on a three-dimensional model (it speaks to building the virtual space at each computer, including a three-dimensional space), and the second cited section speaks to the order in which three-dimensional objects are read out (e.g., front to back, or back to front), and not replaying previously recorded operations on three-dimensional objects.

Therefore, Applicant submits that claim 7 cannot be rendered obvious over Papa in view of Margolin, and in further view of Matsui et al.

The final Office Action also rejected claims 4-6 as allegedly obvious over Papa in view of Margolin, and in further view of Steele et al. (U.S. Pat. Pub. No. 2002/0136167). Applicant respectfully also traverses this rejection.

Claim 4 recites, for example, a first client and a second client that share three-dimensional model data for a connected terminal device.

As submitted above with respect to claim 1, Papa and Margolin fail to disclose, teach or suggest three-dimensional model data for a connected terminal device. In addition, Applicant submits that neither Steele nor the other references disclose, teach or suggest sharing such data

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among clients on a network. Applicant submits Steele only teaches collaborative web browsing, including URL pushing. This fails to remedy the shortcomings of Papa and Margolin with respect to sharing of three-dimensional model data for a connected terminal device.

Therefore, Applicant submits that claim 4 cannot be rendered obvious over Papa in view of Margolin, and in further view of Steele et al.

Claim 14 contains limitations similar to those argued above with respect to claim 4. Thus, the remarks made above with respect to claim 4 are equally applicable to claim 14. Therefore, Applicant submits that claim 14 also cannot be rendered obvious over Papa in view of Margolin, and in further view of Steele et al.

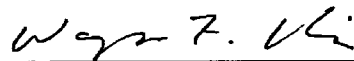
#### CONCLUSION

Applicant submits that the dependent claims not specifically addressed herein are allowable for the same reasons as the independent claims from which they directly or ultimately depend, as well as for their additional limitations.

For all the above reasons, Applicant maintains that the claims of the subject application are patentable over the cited art.

If a telephone conference would be of assistance in advancing prosecution of the subject application, Applicant's undersigned attorney invites the Examiner to telephone him at the number provided.

Respectfully submitted,



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